

**REMARKS**

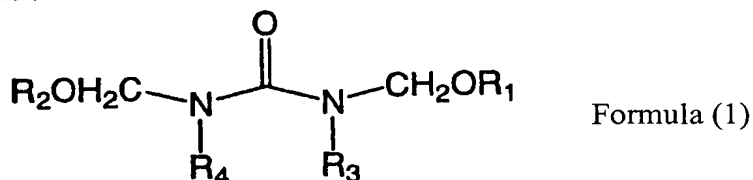
Claims 4-8 and 11-14 are pending in this application. By this Amendment, claims 8 and 11 are amended; and claims 12-14 are added. Claim 8 is amended to correct a typographical error. Support for the amendments to claims and new claims may be found, for example, in the specification at paragraphs [0026] and [0033] and in the original claims. No new matter is added.

**I. Rejection under 35 U.S.C. §103(a)**

Claims 4-8 and 11 are rejected under 35 U.S.C. §103(a) as having been obvious over Kang (U.S. Patent No. 6,468,718) in view of Mizutani (U.S. Patent Application Publication No. 2003/0198894) or Bonk (U.S. Patent No. 4,731,273 or U.S. Patent No. 4,751,269). Applicants respectfully traverse the rejection.

Independent claim 11 is amended to even more clearly distinguish over the applied references. Specifically, independent claim 11 is amended to recite (in-part):

wherein the anti-reflective coating forming composition comprises a resin produced by a condensation reaction between compounds of formula (1),



wherein R<sub>1</sub> and R<sub>2</sub> are independently of each other hydrogen atom or an alkyl group, R<sub>3</sub> and R<sub>4</sub> are independently of each other hydrogen atom, methyl group, ethyl group, hydroxymethyl group or an alkoxymethyl group, and an acid and/or acid generator, and the resin produced from compounds of formula (1) is contained in an amount of 50 mass% or more in a solid content of the anti-reflective coating forming composition....

The applied references disclose no such combination of features. Specifically, the applied references fail to disclose and would not have rendered obvious a resin produced by a condensation reaction between compounds of formula (1) contained in an amount of 50

mass% or more in a solid content of the anti-reflective coating forming composition, as required by claim 1.

The Office Action asserts that Kang discloses an anti-reflective layer that comprises a polymer having an anthracene substituent, may have a triazine initiator, and comprises any known crosslinker such as a melamine compound. See Office Action, pages 2 and 3. However, the Office Action acknowledges that Kang fails to disclose the instantly claimed compound of formula (1), much less a resin produced by a condensation reaction between compounds of formula (1), as required by claim 11. The Office Action asserts that Mizutani resolves this deficiency by disclosing a resist composition comprising a crosslinking compound, the crosslinking compounds including a compound meeting the instant claim limitations. The Office Action further asserts that Bonk also resolves this deficiency by disclosing adhesive resins having tetrabutoxymethyl urea, which is described as a preferred compound of formula (1) by the instant specification. Applicants respectfully disagree.

Applicants respectfully submit that the applied references do not teach or suggest or establish any reason or rationale to provide all the features of amended independent claim 11. Specifically, the applied references at least fail to teach or suggest or establish any reason or rationale to provide *an anti-reflective layer* having "a resin produced by a condensation reaction between compounds of formula (1)...in an amount of 50 mass% or more in a solid content of the anti-reflective coating forming composition," as required by claim 1.

Instead, Kang merely teaches an anti-reflective layer having a very different composition, as is acknowledged by the Office Action on pages 2 and 3. Mizutani discloses a resist composition where a vinyl polymer is used and a compound having a urea structure is used as a crosslinking agent for crosslinking the alkali-soluble resin. See Mizutani, paragraph [0245]. Bonk merely teaches adhesive compositions containing an acrylic polymer as a main component and tetrabutoxy methyl urea or the like as a cross-linking agent. See Bonk, col. 2,

lines 59-68 and col. 4 lines 38-53. All of these references fail to teach or suggest, or establish any reason or rationale to provide "a resin produced by a condensation reaction between compounds of formula (1)" contained in an "amount of 50 mass% or more in a solid content of the anti-reflective coating forming composition," as required by claim 11.

Therefore the presently claimed method would not have been obvious over the applied references, because the applied references fail to teach or suggest, or establish any reason or rationale to provide an anti-reflective layer having the recited composition.

Accordingly, independent claim 11 would not have been obvious over the applied references for at least the reasons discussed above. Claims 4-8 depend from claim 11, and also would not have been obvious for at least the reason that independent claim 11 would not have been obvious.

Reconsideration and withdrawal of the rejection are respectfully requested.

## **II. New Claims**

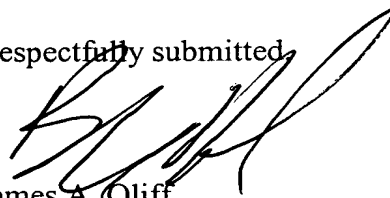
By this Amendment, new claims 12-14 are presented. New claims 12-14 depend from claim 11 and, thus, distinguish over the applied references for at least the reasons discussed above with respect to claim 11. Prompt examination and allowance of new claims 12-14 are respectfully requested.

## **III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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